

~~FILED UNDER SEAL~~UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

INDICTMENT CR 12-88 RHK/LIB

Plaintiff,

(18 U.S.C. § 1951(a))

v.

(18 U.S.C. § 924(c)(1)(A))

(18 U.S.C. § 922(g)(1))

JASON LEE KING,

(18 U.S.C. § 924(a)(2))

(26 U.S.C. § 5845)

Defendant.

(26 U.S.C. § 5861(d))

(26 U.S.C. § 5871)

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Interference with Commerce by Robbery)

1. At all times material to this Indictment the Newby's Market located in Bemidji, Minnesota, was engaged in the retail sale of gasoline, tobacco products, soft drinks, and other household products that are manufactured outside the State of Minnesota, and was a business engaged in and affecting interstate commerce.

2. On or about December 30, 2011, in the State and District of Minnesota, the defendant,

JASON LEE KING,

did unlawfully obstruct, delay, and affect commerce, and attempt to do so, by means of robbery in that the defendant did unlawfully take approximately \$1476 in cash and checks belonging to the Newby's Market by taking the money from a victim employee, against the employee's will, by means of actual and threatened force, violence, and fear of injury to the victim's person, in violation of Title 18, United States Code, Section 1951(a).

SCANNED

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U.S. DISTRICT COURT ST. PAUL

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**COUNT 2**

(Use of a Firearm During a Crime of Violence)

On or about December 30, 2011, in the State and District of Minnesota, the defendant,

**JASON LEE KING,**

knowingly used, carried, and brandished a firearm; namely, a Remington brand, 870 express, 20-gauge sawed-off shotgun, bearing serial number AB295884U, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States; namely, the crime of interference with commerce by a robbery as charged in Count 1, all in violation of Title 18, United States Code, Section 924(c)(1)(A).

**COUNT 3**

(Felon in Possession of a Firearm)

On or about December 30, 2011, in the State and District of Minnesota, the defendant,

**JASON LEE KING,**

having previously been convicted of crimes punishable by imprisonment for a term exceeding one year; namely, 2009 convictions in Beltrami County for (Count 1) kidnapping to facilitate felony or flight, (Count 2) second degree assault with a dangerous weapon, and (Count 3) second degree assault with a dangerous weapon, thereafter knowingly possessed, in and affecting interstate commerce, a Remington brand, 870 express, 20-gauge

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sawed-off shotgun, bearing serial number AB295884U, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

**COUNT 4**

(Possession of an Unregistered Sawed-off Shotgun)

On or about December 30, 2011, in the State and District of Minnesota, the defendant,

**JASON LEE KING,**

knowingly received and possessed a firearm; namely, a Remington brand, 870 express, 20-gauge sawed-off shotgun, bearing serial number AB295884U, having a barrel less than eighteen inches in length, which was not registered to him in the National Firearms Registration and Transfer Record, in violation of Title 26, United States Code, Sections 5845, 5861(d), and 5871.

**FORFEITURE ALLEGATIONS**

Counts 1 through 4 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1), Title 28, United States Code, Section 2461(c), and Title 26, United States Code, Section 5872.

As a result of the foregoing offenses, the defendant,

**JASON LEE KING,**

shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1), any firearm with accessories or any ammunition involved in or used in any knowing violation of section

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922(g)(1), including a Remington brand, 870 express, 20-gauge sawed-off shotgun, bearing serial number AB295884U.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(d)(1), Title 28, United States Code, Section 2461(c), and Title 26, United States Code, Section 5872.

A TRUE BILL

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UNITED STATES ATTORNEY

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FOREPERSON